

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 03-530-A
)	
VINEET K. CHHABRA)	

AGREED ORDER TO FORFEIT SUBSTITUTE ASSET
(Re: Cash in Lieu of 2014 Tesla Model S, VIN: 5YJSA1H27EFP64017)

WHEREAS, on August 31, 2004, the defendant, Vineet K. Chhabra, pleaded guilty to conspiracy to violate the Controlled Substances Act, in violation of Title 21, United States Code, Sections 846 and 841;

WHEREAS, on August 18, 2005, a \$16,000,000.00 money judgment was entered against the defendant, and the outstanding balance is still well in excess of the value of the vehicle described below;

WHEREAS, on June 9, 2016, the Honorable United States Magistrate Judge John F. Anderson signed a seizure warrant authorizing the Government to seize a 2014 Tesla Model S, VIN: 5YJSA1H27EFP64017 (hereinafter "Tesla") as a substitute asset to satisfy, in part, the outstanding money judgment;

WHEREAS, on June 15, 2016, the Government executed the seizure warrant, and the Tesla is currently in the Government's custody;

WHEREAS, the defendant has agreed to pay the Government \$100,000.00 in cash to be applied towards his money judgment in lieu of the Government forfeiting the Tesla, and the Government has agreed to forfeit the cash in lieu of the Tesla;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:


1. Pursuant to Fed. R. Crim. P. 32.2(b)(1) and 21U.S.C. § 853, the United States of America shall forfeit \$100,000.00 to be paid by the defendant to the United States Marshals Service (USMS), which sum shall be applied to the defendant's outstanding money judgment in lieu of the forfeiture of the Tesla.

2. The Tesla, which is currently held by the USMS, shall be released to the defendant upon receipt of the \$100,000.00 plus payment of all expenses incurred by the government in connection with the seizure and storage of the vehicle. These payments shall be made directly to the Marshals Service in accordance with instructions given by the government at the time of payment.

3. Because the \$100,000.00 will be paid by the defendant and applied against his money judgment, only the defendant has an interest in the \$100,000.00, and therefore, there are no other possible claimants to the \$100,000.00 and thus, no necessity to publish notice of the forfeiture.

SO ORDERED THIS ^{SI} 21 DAY OF July 2016.

Alexandria, Virginia

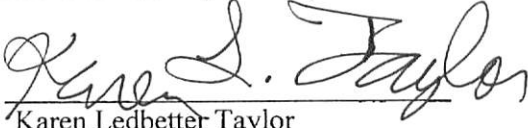

/s/ Leonie M. Brinkema
United States District Judge


WE ASK FOR THIS:

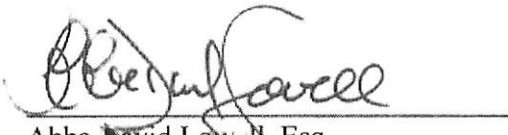
For the United States of America, plaintiff

For Vineet K. Chhabra, defendant

Dana J. Boente
United States Attorney

By: 
Karen Ledbetter Taylor
Assistant United States Attorney


Vineet K. Chhabra
Defendant


Abbe David Lowell Esq.
Counsel for the Defendant